

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA and the
COMMONWEALTH OF MASSACHUSETTS,

Plaintiffs, ex rel.

LISA WOLLMAN, M.D.,

Plaintiff-Relator,

v.

THE GENERAL HOSPITAL CORPORATION
(d/b/a the Massachusetts General Hospital), THE
MASSACHUSETTS GENERAL HOSPITAL'S
PHYSICIAN'S ORGANIZATION and
PARTNERS HEALTHCARE SYSTEM, INC.,

Defendants.

Civil Action No. 15-11890-ADB

**DEFENDANTS FORTHCOMING STATEMENT OF UNDISPUTED MATERIAL
FACTS IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT AGAINST PLAINTIFF-RELATOR**

Pursuant to this Court's preference that parties file "a joint statement of disputed (or undisputed) facts," Defendants and Relator will file a joint statement of material facts with their replies in support of their motions for summary judgment. Defendants have served their statement of undisputed material facts in support of summary judgment on Relator on July 15, 2021.

Dated: July 15, 2021

THE GENERAL HOSPITAL CORPORATION (d/b/a the Massachusetts General Hospital), THE MASSACHUSETTS GENERAL HOSPITAL'S PHYSICIAN'S ORGANIZATION and PARTNERS HEALTHCARE SYSTEM, INC.,

By their attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system on July 15, 2021, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as unregistered participants.

/s/ Aaron Lang